

December 3, 2024

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**RE: *Patagon Management LLC v. The Aragon Association et al.*,
No. 1:24-cv-08290-AS (S.D.N.Y.)**

Dear Judge Subramanian,

The parties write jointly to seek relief from the portion of the Court's November 4, 2024 Order and Individual Practices requiring submission of a proposed Civil Case Management Plan and Scheduling Order. (*See* Dkt. No. 10 at 2).

As the parties will explain in further detail in their forthcoming joint letter in advance of the December 11, 2024 initial pre-trial conference (*see* Dkt. No. 15), the parties have agreed not to pursue discovery prior to the filing of Defendants' forthcoming motions to dismiss, in light of Defendants' belief in the existence of significant and potentially dispositive threshold issues concerning venue and personal jurisdiction, as well as the complexity of obtaining discovery from the Swiss Defendants.

Accordingly, the parties request the Court "SO ORDER" this letter and thereby hold in abeyance the requirement that the parties submit a proposed Civil Case Management Plan and Scheduling Order until such time as the Court deems appropriate.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ John Hardin

John Hardin
PERKINS COIE LLP
500 N. Akard Street
Suite 3300
Dallas, TX 75201
Telephone: (214) 965-7717
johnhardin@perkinscoie.com

Emily Barbara Cooper
PERKINS COIE LLP

/s/ Gregory Mortenson

Samson A. Enzer
Gregory Strong (*pro hac vice* forthcoming)
Gregory Mortenson
CAHILL GORDON & REINDEL LLP
32 Old Slip
New York, New York 10005
Telephone: (212) 701-3708
SEnzer@cahill.com
GStrong@cahill.com
GMortenson@cahill.com

1155 Avenue of the Americas
22nd Floor
New York, NY 10036
Telephone: (212) 261-6816
ecooper@perkinscoie.com

*Attorneys for Plaintiff Patagon
Management LLC*

Michael Frisch (*pro hac vice* forthcoming)
CROKE FAIRCHILD DUARTE & BERES LLC
180 N LaSalle Street, Suite 3400
Chicago, IL 60601
Telephone: (312) 650-8650
mfrisch@crokefairchild.com

*Attorneys for Defendants The Aragon Shield
Foundation and Aragon X AG*

/s/ David Kirk
David Kirk
KIRK & INGRAM, LLP
43 West 43rd Street, Suite 279
New York, NY 10036-7424
Telephone: (212) 859-3504
dkirk@kirkingram.com

Attorneys for Defendant Luis Cuende